

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ERNESTO ENCINAS,  
  
Defendant.

Case No. '14 CR0344 MMA

I N F O R M A T I O N

Title 18, U.S.C., Sec. 371 -  
Conspiracy to Commit Offenses  
against the United States; Title  
26, U.S.C., Sec. 7206(1) - False  
Tax Return

The United States Attorney charges:

Count 1

Beginning on a date unknown, but no later than 2011, and  
continuing through December 2013, in the Southern District of  
California and elsewhere, Defendant ERNESTO ENCINAS and others  
conspired together to:

- (1) Knowingly and willfully make foreign national contributions  
and donations, aggregating \$25,000 and more during a  
calendar year in violation of Title 2, United States Code,  
Sections 437g(d)(1)(A)(i) and 441e;

\*:::San Diego/Imperial  
2/12/14

- 1 (2) Knowingly and willfully make foreign national expenditures,  
2 aggregating \$25,000 and more during a calendar year in  
3 violation of Title 2, United States Code, Sections  
4 437g(d)(1)(A)(i) and 441e;
- 5 (3) Knowingly and willfully make contributions to a candidate  
6 for federal office in the names of other persons,  
7 aggregating \$25,000 and more during a calendar year in  
8 violation of Title 2, United States Code, Sections  
9 437g(d)(1)(A)(i) and 441f; and
- 10  
11 (4) Knowingly falsify a record with the intent to impede,  
12 obstruct and influence the investigation and proper  
13 administration of a matter within the jurisdiction of the  
14 Federal Bureau of Investigation in violation of Title 18,  
15 United States Code, Section 1519;

16  
17 And on August 1, 2013, Defendant ERNESTO ENCINAS committed an  
18 overt act in furtherance of this conspiracy by proposing to arrange  
19 "foreign investment" for a possible candidate for elective office in  
20 San Diego; all in violation of Title 18, United States Code, Section  
21 371.

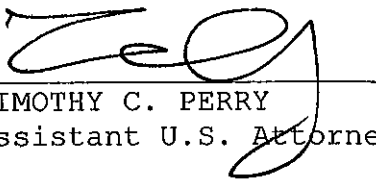
22 Count 2

23 On or about October 15, 2012, in the Southern District of  
24 California, Defendant ERNESTO ENCINAS made and subscribed a U.S.  
25 Individual Income Tax Return, Form 1040, for the tax year 2011, which  
26 was verified by a written declaration that it was made under the  
27 penalties of perjury, and caused to be filed this income tax return  
28 with the Internal Revenue Service, and which return the defendant did

1 not believe to be true and correct as to every material matter, in  
2 that Line 22 (Total Income) of the Form 1040 stated that the  
3 defendant's total income was \$249,669, whereas, as the defendant then  
4 and there well knew, this total omitted an additional approximately  
5 \$147,300 that the defendant received in "under-the-table" cash  
6 payments in exchange for security services; in violation of Title 26,  
7 United States Code, Section 7206(1).

8  
9 DATED: 2/13/14.

CINDY M. CIPRIANI  
Acting United States Attorney

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13 TIMOTHY C. PERRY  
14 Assistant U.S. Attorney  
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